



BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
Chairman
JIM IRVIN
Commissioner
MARC SPITZER
Commissioner

Arizona Corporation Commission

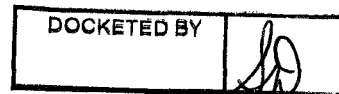
DOCKETED

JUN 29 2001

RECEIVED

2001 JUN 29 P 1:27

AZ CORP COMMISSION
DOCUMENT CONTROL



IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF
1996.

DOCKET NO. T-00000B-97-0238

**WORLDCOM'S RESPONSE TO
QWEST CORPORATION'S FOURTH
SET OF DATA REQUESTS**

WorldCom, Inc., ("WorldCom") on behalf of its regulated subsidiaries, submits the following objections and responses to the Fourth Set of Data Requests upon WorldCom, Inc. served by Qwest Corporation, formerly U S WEST Communications, Inc., ("Qwest).

OBJECTIONS

WorldCom objects to Qwest's Definitions, Instructions and Discovery Requests on the grounds that they are unreasonably burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, vague, ambiguous, and seek disclosure of highly sensitive, confidential information. These objections are incorporated into each further response set forth below.

DATA REQUESTS

1. Are you providing **facilities-based** local exchange service to business customers within **Qwest's service territory** in the state of Arizona?

WorldCom's Response: Subject to and without waiving its objections, WorldCom responds as follows: See Attachment A – Confidential and Proprietary Data

Source: Susan Travis, WorldCom, Inc. 707 17th Street, Suite 3600, Denver, CO. 70202

Preparer: Teresa Tan, WorldCom, Inc., 201 Spear Street, 9th Fl., San Francisco, CA. 94105

2. Please identify the number of business access lines you serve via facilities-based competition within Qwest's service territory in the state of Arizona.

WorldCom's Response: Subject to and without waiving its objections, WorldCom responds as follows: See response to Request No. 1.

3. Please identify the number of business access lines you serve within Qwest's service territory in the state of Arizona via facilities owned by you.

WorldCom's Response: Subject to and without waiving its objections, WorldCom responds as follows: See response to Request No. 1.

4. Please identify the number of business access lines you serve within Qwest's service territory in the state of Arizona via facilities you lease from a provider other than Qwest.

WorldCom's Response: Subject to and without waiving its objections, WorldCom responds as follows: See response to Request No. 1.

5. Please identify the number of business access lines you serve via **UNE-P** within Qwest's service territory in the state of Arizona.

WorldCom's Response: Subject to and without waiving its objections, WorldCom responds as follows: See response to Request No. 1.

6. Please identify the number of business access lines you serve via **UNEs** and/or **UNE Combinations** within Qwest's service territory in the state of Arizona.

WorldCom's Response: Subject to and without waiving its objections, WorldCom responds as follows: See response to Request No. 1.

7. Please identify the number of business access lines you serve via **resale** within Qwest's service territory in the state of Arizona.

WorldCom's Response: Subject to and without waiving its objections, WorldCom responds as follows: See response to Request No. 1.

8. Please identify the number of business customers you serve via facilities-based competition within Qwest's service territory in the state of Arizona.

WorldCom's Response: Subject to and without waiving its objections, WorldCom responds as follows: See response to Request No. 1.

9. Please identify the number of business customers you serve within Qwest's service territory in the state of Arizona via facilities owned by you.

WorldCom's Response: Subject to and without waiving its objections, WorldCom responds as follows: See response to Request No. 1.

10. Please identify the number of business customers you serve within Qwest's service territory in the state of Arizona via facilities you lease from a provider other than Qwest.

WorldCom's Response: Subject to and without waiving its objections, WorldCom responds as follows: See response to Request No. 1.

11. Please identify the number of business customers you serve via **UNE-P** within Qwest's service territory in the state of Arizona.

WorldCom's Response: Subject to and without waiving its objections, WorldCom responds as follows: See response to Request No. 1.

12. Please identify the number of business customers you serve via **UNEs** and/or **UNE Combinations** within Qwest's service territory in the state of Arizona.

WorldCom's Response: Subject to and without waiving its objections, WorldCom responds as follows: See response to Request No. 1.

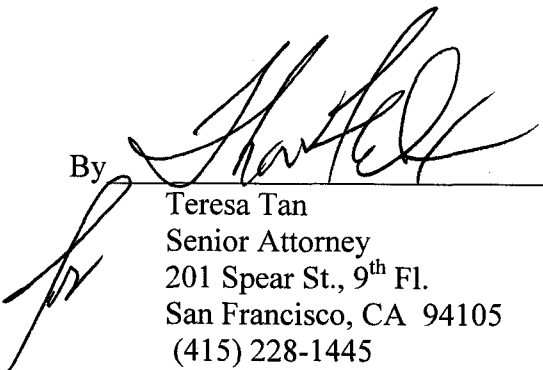
13. Please identify the number of business customers you serve via **resale** within Qwest's service territory in the state of Arizona.

WorldCom's Response: Subject to and without waiving its objections, WorldCom responds as follows: See response to Request No. 1.

DATED this 27th day of June, 2001.

WORLDCOM, INC.

By



Teresa Tan
Senior Attorney
201 Spear St., 9th Fl.
San Francisco, CA 94105
(415) 228-1445

**ORIGINAL and ten (10)
copies of the foregoing sent via *overnight*
mail this 28th day of June 2001,
with:**

Arizona Corporation Commission
Docket Control – Utilities Division
1200 W. Washington Street
Phoenix, Arizona 85007

**COPY of the foregoing sent via *overnight*
mail this 28th day of June 2001,
to:**

Maureen Scott*
Legal Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Jane Rodda, Chief Administrative Law Judge*
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Deborah Scott, Director*
Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

**COPY of the foregoing sent via *U.S. Mail*
this 28th day of June 2001, to:**

Mark J. Trierweiler
Vice President – Government Affairs
AT&T Communications of the
Mountain States
111 West Monroe, Suite 1201
Phoenix, Arizona 85003

Scott Wakefield
Residential Utility Consumer Office
2828 N. Central Avenue
Phoenix, Arizona 85004

Maureen Arnold
US West Communications, Inc.
3033 N. Third Street
Room 1010
Phoenix, Arizona 85012

Mark Dioguardi
Tiffany and Bosco PA
500 Dial Tower
1850 N. Central Avenue
Phoenix, Arizona 85004

“*” Indicates that party has signed a Protective Agreement and will receive confidential material.

Thomas L. Mumaw
Snell & Wilmer
One Arizona Center
Phoenix, Arizona 85004-0001

Andrew O. Isar
TRI
4312 92nd Avenue N.W.
Gig Harbor, Washington 98335

Darren S. Weingard
Stephen H. Kukta
Sprint Communications Co., L.P.
1850 Gateway Drive, 7th Floor
San Mateo, CA 94404-2467

Timothy Berg*
Fennemore, Craig, P.C.
3003 N. Central Avenue
Suite 2600
Phoenix, Arizona 85012-3913

Charles Steese*
US West, Inc.
1801 California Street, Ste. 5100
Denver, Colorado 80202

Joan S. Burke*
Osborn & Maledon
2929 N. Central Avenue
21st Floor
Phoenix, Arizona 85067-6379

Richard S. Wolters*
AT&T & TCG
1875 Lawrence Street
Suite 1575
Denver, Colorado 80202

Michael M. Grant
Todd C. Wiley
Gallagher & Kennedy
2575 E. Camelback Road
Phoenix, AZ 85016-4240

Richard M. Rindler
Morton J. Posner
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007-5116

Mary Tee
Electric Lightwave, Inc.
P.O. Box 8905
Vancouver, Washington 98668-8905

Raymond S. Heyman
Michael Patten
Roshka Heyman & DeWulf
Two Arizona Center
400 North Fifth Street
Suite 1000
Phoenix, Arizona 85004-3906

Diane Bacon, Legislative Director
Communications Workers of America
5818 North 7th Street
Suite 206
Phoenix, Arizona 85014-5811

Charles Kallenback
ACSI
131 National Business Parkway
Annapolis Junction, Maryland 20701

Bradley Carroll, Esq.
Cox Arizona Telcom, L.L.C.
1550 West Deer Valley Road
Phoenix, Arizona 85027

Joyce Hundley
United States Department of Justice
Antitrust Division
1401 H Street, N.W.
Suite 8000
Washington, D.C. 20530

“*” Indicates that party has signed a Protective Agreement and will receive confidential material.

Daniel Waggoner

Davis Wright Tremaine
2600 Century Square
15011 Fourth Avenue
Seattle, Washington 98101-1688

Alaine Miller

NextLink Communications, Inc.
500 108th Avenue NE, Suite 2200
Bellevue, Washington 98004

Mark N. Rogers

Excell Agent Services, LLC
2175 W. 14th Street
Tempe, Arizona 85281

Traci Grundon

Davis Wright Tremaine LLP
1300 S.W. Fifth Avenue
Portland, Oregon 97201

Mark P. Trinchero

Davis Wright Tremaine LLP
1300 S.W. Fifth Avenue, Suite 2300
Portland, Oregon 97201

Gena Doyscher

Global Crossing Local Services, Inc.
1221 Nicollet Mall
Minneapolis, Minnesota 55403-2420

Penny Bewick

New Edge Networks, Inc.
P.O. Box 5159
Vancouver, WA 98668

Jon Loehman

Managing Director-Regulatory
SBC Telecom, Inc.
5800 Northwest Parkway
Suite 135, Room I.S. 40
San Antonio, TX 78249

M. Andrew Andrade

5261 S. Quebec Street
Suite 150
Greenwood Village, CO 80111

Douglas Hsiao

Rhythms Links Inc.
9100 E. Mineral Circle
Englewood, CO 80112

Karen Clauson

Eschelon Telecom, Inc.
730 2nd Avenue South
Suite 1200
Minneapolis MN 55402

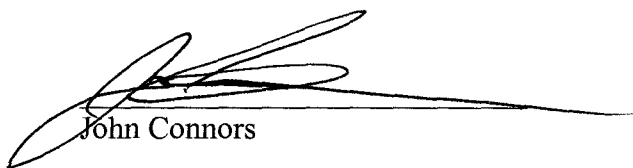
Andrea P. Harris

Senior Manager, Regulatory
Allegiance Telecom, Inc. of Arizona
2101 Webster, Suite 1580
Oakland, CA 94612

“*” Indicates that party has signed a Protective Agreement and will receive confidential material.

And sent by e-mail on June 27, 2001, to the following:

Joanne Ragge [jragge@uswest.com]; Mscott@cc.state.az.us; robert.q.priebe@alltel.com;
mlengel@att.com; rwolters@att.com; michael.grant@azbar.org; dpozefsky@azruco.com;
rhip@bellatlantic.net; hagoodb@bellsouth.net; MAD@CC.STATE.AZ.US;
MJR@CC.STATE.AZ.US; mdoberne@Covad.COM; mzulevic@Covad.COM;
PCeguera@Covad.COM; bradley.carroll@cox.com; larry.tierney@cox.com;
Cattanach.Robert@dorseylaw.com; klclauson@eschelon.com; tberg@fclaw.com;
jill.vinjamuri@kutakrock.com; thc@lrlaw.com; barbara.c.young@mail.sprint.com;
eric.s.heath@mail.sprint.com; cpost@mail.state.ne.us; geneh@mail.state.ne.us;
jsburke@omlaw.com; mpatten@Rhd-law.com; rsh@Rhd-law.com; dhsiao@rhythms.net;
jcrockett@swlaw.com; tmumaw@swlaw.com; CM707A@txmail.sbc.com;
acrain@uswest.com; csteese@uswest.com; mjarnol@uswest.com; mrchri2@uswest.com;
srbeck@uswest.com; terry.tan@wcom.com; thomas.f.dixon@wcom.com;
JLivengood@Z-TEL.com



John Connors

“*” Indicates that party has signed a Protective Agreement and will receive confidential material.